



California Regional Water Quality Control Board

San Diego Region



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9174 Sky Park Court, Suite 100, San Diego, California 92123-4353
(858) 467-2952 • Fax (858) 571-6972
[http:// www.waterboards.ca.gov/sandiego](http://www.waterboards.ca.gov/sandiego)

December 28, 2011

In reply refer to:
CRU: 9 000000283:kschwall
CIWQS Place ID: 244011

Mark Edson
Installation Environmental Program Manager
Navy Public Work Graving Dock
PWC Code 720
San Diego, CA 92136

Dear Mr. Edson:

Subject: Review of Self-Monitoring Reports for US Navy Public Work Graving Dock, Order No. R9-2003-0265, NPDES Permit No. CA107867 for the period May 01, 2007 through September 30, 2011

The San Diego Water Board has completed review of the referenced reports for the subject facility in Table 1 below, and has no comments at this time.

Table 1

2007 MONITORING REPORTS REVIEWED FOR ORDER NO. R9-2003-0265			
FREQUENCY	PERIOD	REPORT DATE	DATE RECEIVED
Monthly	May 2007	June 01, 2007	June 04, 2007
	June 2007	July 19, 2007	July 19, 2007
	July 2007	August 03, 2007	August 06, 2007
	August 2007	August 30, 2007	August 31, 2007
	September 2007	October 01, 2007	October 04, 2007
	October 2007	November 26, 2007	November 27, 2007
	November 2007	November 30, 2007	December 10, 2007
	December 2007	January 02, 2008	January 04, 2008
Quarterly	April – June 2007	July 19, 2007	July 19, 2007
	July – September 2007	October 11, 2007	October 15, 2007
	October – December 2007	January 08, 2008	January 09, 2008
Annual	July 2006 – June 2007	August 30, 2007	August 31, 2007
Chem. Util. Audit	July 2006 – June 2007	August 14, 2007	August 28, 2007

The San Diego Water Board has completed review of the referenced reports for the subject facility in Table 2 below, and has the following comments:

Table 2

2008 MONITORING REPORTS REVIEWED FOR ORDER NO. R9-2003-0265			
FREQUENCY	PERIOD	REPORT DATE	DATE RECEIVED
Monthly	January 2008	February 07, 2008	February 11, 2008
	February 2008	March 04, 2008	March 06, 2008
	March 2008	March 25, 2008	March 27, 2008
	April 2008	May 20, 2008	June 4, 2008
	May 2008	June 11, 2008	June 24, 2008
	June 2008	July 22, 2008	July 29, 2008
	July 2008	August 28, 2008	August 28, 2008
	August 2008	August 28, 2008	August 28, 2008
	September 2008	September 30, 2008	October 01, 2008
	October 2008	November 04, 2008	November 06, 2008
	November 2008	January 05, 2009	January 08, 2009
	December 2008	January 05, 2009	January 08, 2009
Quarterly	January – March 2008	April 11, 2008	April 14, 2008
	April – June 2008	July 22, 2008	July 29, 2008
	July – September 2008	November 03, 2008	November 06, 2008
	October – December 2008	January 30, 2009	February 02, 2009
Semiannual	January – June 2008	July 22, 2008	July 29, 2008
	July – December 2008	January 30, 2009	February 02, 2009
Annual	July 2007 – June 2008	August 28, 2008	August 28, 2008
	Chem. Util. Audit	August 28, 2008	August 28, 2008

January - December 2008 monthly reports:

• **Reporting Violation of Monitoring and Reporting Program No. R9-2003-0265, Section F, Table 3**

1. The Compliance Certification for the month of April was received on June 04, 2008. Monitoring and Reporting Program No. R9-2003-0265, Section F, Table 3 requires that the monthly Compliance Certification be received by the first day of the second month after the month of sampling. The certification was due on June 01, 2008.

2. The Compliance Certification for the month of November was received on January 08, 2009. Monitoring and Reporting Program No. R9-2003-0265, Section F, Table 3 requires that the monthly Compliance Certification be received by the first day of the second month after the month of sampling. The certification was due on January 01, 2009.

January – March; April – June; July – September; October – December 2008 quarterly reports:

- **Comment**

3. The October through December 2008 quarterly report; including the Spill and Illicit Discharge Log, Graving Dock Flooding Log, and the Graving Dock Floodwater Video Log were received on February 2, 2009. Monitoring and Reporting Program No. R9-2003-0265, Section F, Table 3 requires this quarterly report to be received by February 1, 2009. The San Diego Water Board is aware that the due date fell on a Sunday. However, please be aware that the due dates listed in the Monitoring and Reporting Program are the last acceptable dates when reports are considered on-time. Please ensure that all reports are submitted by the report due date in the Monitoring and Reporting Program.

- **Reporting Violation of Monitoring and Reporting Program No R9-2003-0265, Section F, Table 3**

4. The July through September 2008 Quarterly Report including the Spill and Illicit Discharge Log, Graving Dock Flooding Log, and Graving Dock Floodwater Video Log was received on November 06, 2008. Monitoring and Reporting Program No. R9-2003-0265, Section F, Table 3 requires that the report in question shall be received by November 01, 2008.

- **Monitoring Violation of Monitoring and Reporting Program, Section C.2 of Order No. R9-2003-0265**

5. There was no video recording of the flooding event that took place on November 21, 2008 during the reporting period October through December 2008. Monitoring and Reporting Program No. R9-2003-0265, Section C.2 states that the discharger shall record on VHS video tape the condition of its graving dock immediately prior to each flooding, and the initial flooding of the graving dock.

January – June; July – December 2008 semi-annual reports:

- **Comment**

6. The Waste Hauling Log for the reporting period July through December was received on February 2, 2009. Monitoring and Reporting Program No. R9-2003-0265, Section F, Table 3 requires that the report in question be received by

February 1, 2009. The San Diego Water Board is aware that the due date fell on a Sunday. However, please be aware that the due dates listed in the Monitoring and Reporting Program are the last acceptable dates when reports are considered on-time. Please ensure that all reports are submitted by the report due date in the Monitoring and Reporting Program.

July 2007 – June 2008 Annual report:

• **Monitoring Violation of Monitoring and Reporting Program, Section D.3.i.ii of Order No. R9-2003-0265**

7. There were no storm water samples taken during the one qualifying rain event which occurred on February 14, 2008. The reason given was that the United States Navy did not have the funding necessary to execute a contract for storm water sampling. Monitoring and Reporting Program No. R9-2003-0265 section D.3.a.i.ii requires the discharger to collect storm water samples during the first hour of discharge from the first storm of the wet season that produces discharges and at least one other storm in the wet season that produces discharges. Please ensure that all samples are obtained and submitted for analysis as required by the Monitoring and Reporting Program.

The San Diego Water Board has completed review of the referenced reports for the subject facility in Table 3 below, and has the following comments:

Table 3

2009 MONITORING REPORTS REVIEWED FOR ORDER NO. R9-2003-0265			
FREQUENCY	PERIOD	REPORT DATE	DATE RECEIVED
Monthly	January 2009	January 30, 2009	February 02, 2009
	February 2009	March 06, 2009	March 12, 2009
	March 2009	April 02, 2009	April 03, 2009
	April 2009	May 08, 2009	May 14, 2009
	May 2009	June 11, 2009	June 19, 2009
	June 2009	July 01, 2009	July 09, 2009
	July 2009	July 30, 2009	August 03, 2009
	August 2009	September 22, 2009	September 23, 2009
	September 2009	October 06, 2009	October 08, 2009
	October 2009	November 09, 2009	November 12, 2009
	November 2009	December 07, 2009	December 09, 2009
	December 2009	January 15, 2010	February 01, 2010
Quarterly	January – March 2009	May 08, 2009	May 12, 2009
	April – June 2009	July 01, 2009	July 09, 2009
	July – September 2009	October 06, 2009	October 08, 2009

2009 MONITORING REPORTS REVIEWED FOR ORDER NO. R9-2003-0265			
FREQUENCY	PERIOD	REPORT DATE	DATE RECEIVED
	October – December 2009	January 15, 2010	February 01, 2010
Semiannual	January – June 2009	July 30, 2009	August 03, 2009
	July – December 2009	January 15, 2010	February 01, 2010
Annual	July 2008 – June 2009	August 20, 2009	August 20, 2009
Chem. Util. Audit	July 2008 – June 2009	August 24, 2009	August 27, 2009

January – March; April – June; July – September; October – December 2009 quarterly reports:

• **Reporting Violation of Monitoring and Reporting Program, Section F, Table 3 of Order No. R9-2003-0265**

8. The January through March 2009 Quarterly Report including the Spill and Illicit Discharge Log, Graving Dock Flooding Log, and Graving Dock Floodwater Video Log was received on May 12, 2009. Monitoring and Reporting Program No. R9-2003-0265, Section F, Table 3 requires that the report in question shall be received by May 01, 2009.

January – June; July – December 2009 semi-annual reports:

• **Comment**

9. The Waste Hauling Log for the reporting period January through June was received on August 03, 2009. Monitoring and Reporting Program No. R9-2003-0265, Section F, Table 3 requires that the report in question be received by August 01, 2009. The San Diego Water Board is aware that the due date fell on a Sunday. However, please be aware that the due dates listed in the Monitoring and Reporting Program are the last acceptable dates when reports are considered on-time. Please ensure that all reports are submitted by the report due date in the Monitoring and Reporting Program.

July 2008 – June 2009 Annual reports:

• **Monitoring Violation of Monitoring and Reporting Program, Section K, Table 5 of Order No. R9-2003-0265**

10. Sediment chemistry testing method 200.7 was used for copper testing during the reporting period July 2008 through June 2009. Monitoring and Reporting

Program No. R9-2003-0265, section K, table 5 requires that sediment chemistry testing method 6010 be used when testing for copper.

The San Diego Water Board has completed review of the referenced reports for the subject facility in Table 4 below, and has the following comments:

Table 4

2010 MONITORING REPORTS REVIEWED FOR ORDER NO. R9-2003-0265			
FREQUENCY	PERIOD	REPORT DATE	DATE RECEIVED
Monthly	January 2010	February 24, 2010	March 03, 2010
	February 2010	March 30, 2010	April 01, 2010
	March 2010	April 30, 2010	April 30, 2010
	April 2010	May 28, 2010	June 01, 2010
	May 2010	July 01, 2010	July 01, 2010
	June 2010	July 29, 2010	August 02, 2010
	July 2010	August 23, 2010	August 30, 2010
	August 2010	October 01, 2010	October 06, 2010
	September 2010	October 15, 2010	October 28, 2010
	October 2010	November 22, 2010	November 24, 2010
	November 2010	December 20, 2010	December 22, 2010
	December 2010	January 31, 2011	February 01, 2011
Quarterly	January – March 2010	April 30, 2010	April 30, 2010
	April – June 2010	July 29, 2010	August 02, 2010
	July – September 2010	October 15, 2010	October 28, 2010
	October – December 2010	January 31, 2011	February 01, 2011
Semiannual	January – June 2010	July 29, 2010	August 02, 2010
	July – December 2010	January 31, 2011	February 01, 2011
Annual	July 2009 – June 2010	August 18, 2010	August 30, 2010
Chem. Util. Audit	July 2009 – June 2010	August 23, 2010	August 30, 2010

January - December 2010 monthly reports:

- **Reporting Violation of Monitoring and Reporting Program, Section F, Table 3 of Order No. R9-2003-0265**

11. The Compliance Certification for the month of January was received on March 03, 2010. Monitoring and Reporting Program No. R9-2003-0265, Section F, Table 3 requires the monthly Compliance Certification be received by the first

16. The Waste Hauling Log for the reporting period January through June 2010 was received on August 02, 2010. Monitoring and Reporting Program No. R9-2003-0265, Section F, Table 3 requires this report be received by August 01, 2010. The San Diego Water Board is aware that the due date fell on a Sunday. However, please be aware that the due dates listed in the Monitoring and Reporting Program are the last acceptable dates when reports are considered on-time. Please ensure that all reports are submitted by the report due date in the Monitoring and Reporting Program.

July 2009 – June 2010 Annual reports:

• **Monitoring Violation of Monitoring and Reporting Program, Section K, Table 5 of Order No. R9-2003-0265**

17. Sediment chemistry testing method 200.7 was used for copper testing during the reporting period July 2009 through June 2010. Monitoring and Reporting Program No. R9-2003-0265 section K, table 5 requires that sediment chemistry testing method 6010 be used when testing for copper.

The San Diego Water Board has completed review of the referenced reports for the subject facility in Table 5 below, and has the following comments:

Table 5

2011 MONITORING REPORTS REVIEWED FOR ORDER NO. R9-2003-0265			
FREQUENCY	PERIOD	REPORT DATE	DATE RECEIVED
Monthly	January 2011	February 22, 2011	February 25, 2011
	February 2011	March 30, 2011	April 04, 2011
	March 2011	April 27, 2011	April 29, 2011
	April 2011	May 25, 2011	May 26, 2011
	May 2011	June 23, 2011	June 28, 2011
	June 2011	July 19, 2011	July 21, 2011
	July 2011	August 29, 2011	August 31, 2011
	August 2011	September 26, 2011	September 28, 2011
	September 2011	October 28, 2011	October 31, 2011
Quarterly	January – March 2011	April 27, 2011	April 29, 2011
	April – June 2011	July 19, 2011	July 21, 2011
	July – September 2011	October 28, 2011	October 31, 2011
Semiannual	January – June 2011	July 19, 2011	July 21, 2011
Annual			
	July 2010 – June 2011	August 29, 2011	August 31, 2011

2011 MONITORING REPORTS REVIEWED FOR ORDER NO. R9-2003-0265			
FREQUENCY	PERIOD	REPORT DATE	DATE RECEIVED
Chem. Util. Audit	July 2010 – June 2011	August 29, 2011	August 31, 2011

January – September 2011 monthly reports:

• **Reporting Violation of Monitoring and Reporting Program, Section F, Table 3 of Order No. R9-2003-0265**

18. The Compliance Certification for the month of February was received on April 04, 2011. Monitoring and Reporting Program No. R9-2003-0265, Section F, Table 3 requires that the monthly Compliance Certification be received by the first day of the second month after the month of sampling. The certification was due on April 01, 2011.

January – March; April – June; July – September 2011 quarterly reports:

- No comments at this time

January – June 2011 semi-annual reports:

- No comments at this time

July 2010 – June 2011 Annual reports:

• **Monitoring Violation of Monitoring and Reporting Program, Section B.2 of Order No. R9-2003-0265**

19. pH samples collected for the Annual Storm Water Monitoring report were not analyzed immediately. Monitoring must be conducted according to United States Environmental Protection Agency (USEPA) test procedures under Title 40, United States Code of Federal Regulations (CFR), Part 136; *Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act*.

Please take steps to ensure that the violations noted above do not occur in the future. Pursuant to the California Water Code (CWC), the violations noted above are subject to additional enforcement action(s) by the San Diego Water Board including issuance of a time schedule order, cease and desist order, cleanup and abatement order, referral to the district attorney for criminal prosecution, or referral to the attorney general.

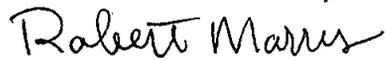
The heading portion of this letter includes a San Diego Water Board code number noted after "In reply refer to:" In order to assist us in the processing of your correspondence please include this code number in the heading or subject line portion of all correspondence and reports to the San Diego Water Board pertaining to this matter.

Mr. Mark Edson
Navy Public Work Graving Dock

December 28, 2011

If you have any questions regarding the above, please contact Kristin Schwall at (858) 467-2345 or kschwall@waterboards.ca.gov.

Respectfully,



Robert Morris
Senior Engineer

RWM:ks

V: (1) 914965, (2) 914966, (4) 914967, (5) 914968, (7) 914970, (8) 914971, (10) 914972, (11) 914973, (12) 914974, (13) 914975, 915036, (17) 914976, (18) 194977, (19) 914978
RM: 382513

Order No.	R9-2003-0265
NPDES No.	CA0107867
CIWQS Place ID	244011
WDID	9 000000283
Reg. Measure No.	132003
Party ID	48287
Person ID	504822